

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Anthony White Plaintiff, vs. Officers Anthony Driver, Joseph Sanders Defendants	Case No. 2017 C 0375  Judge: Joan B. Gottschall  Magistrate Judge: Jeffrey Cole
---	---

**FIRST AMENDED COMPLAINT**

Plaintiff, Anthony White, by attorney Eugene N. Traunfeld, states for her First Amended Complaint against Defendants, Officer Anthony Driver, and Officer Joseph Sanders Sr. as follows:

***Introduction***

1. This is a civil action seeking money damages against defendants, Officer Anthony Driver, and Officer Joseph Sanders Sr. of the City of Chicago Police Department for violation of plaintiff's constitutional rights by defendants in entering plaintiff's home without search warrant, arrest warrant, or probable cause.
2. This action is brought pursuant to 42 USC, Section 1983 for violation of the Fourth Amendment to the United States Constitution. The Court has jurisdiction under 42 USC, Section 1983.

***Parties***

3. Plaintiff is a citizen and resident of the City of Chicago, State Of Illinois and the United States of America.
4. At all times relevant herein, defendants, Officer Anthony Driver, and Officer Joseph Sanders Sr. were police officers employed by the City of Chicago Police Department
5. Plaintiff sues defendants Officers Anthony Driver, and Joseph Sanders Sr. in their individual capacities.

***Statement of Claim***

6. At all times referred to herein, defendants, Officer Anthony Driver, and Officer Joseph Sanders Sr. acted under color of the laws, statutes, ordinances, regulations, policies, customs and usages of the State of Illinois, City of Chicago.
7. On July 19, 2015, at approximately 7:00 to 8:00 p.m., plaintiff, Anthony White was asleep in her bedroom located in an apartment she occupied as her home, pursuant to lease at 501 E. 80th Street in Chicago, Illinois.

8. On said date, location and time, plaintiff had left her apartment keys in the front door to her apartment. The front door was unlocked.

9. On said date, while she was lying in her bedroom, defendants knocked on the front door to plaintiff's apartment. When there was no response to the knocking, the defendants entered plaintiff's home without search warrant, without probable cause, without specific exigency and without permission.

10. Upon entering plaintiff's home, defendants marched into plaintiff's bedroom where she was still lying on her bed. Defendants asked plaintiff to provide information regarding an individual named "Joshua Williams." When plaintiff told defendants that she did not know the whereabouts of "Joshua Williams," defendants asked plaintiff to produce her I.D.

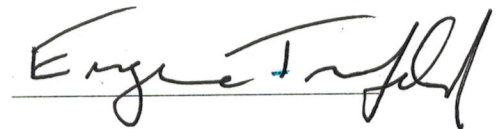
11. Upon being shown plaintiff's identification, the officers arrested plaintiff.

12. Defendants had no search warrant, no arrest warrant, were not invited into her apartment, and there was no specific exigency, therefore defendants were not authorized to enter plaintiff's home.

13. As a result of defendants acts as described above, which were intentional, wanton, willfull and malicious, defendants deprived plaintiff of the right to be free from unlawful entry into her residence in violation of the Fourth Amendment of the Constitution of the United States.

WHEREFORE, Plaintiff, Anthony White demands judgment against defendants, Officer Anthony Driver, and Officer Joseph Sanders Sr., jointly and severally, for:

1. Damages sustained by plaintiff;
2. Punitive damages in such amount as will sufficiently punish defendants for defendants willful and malicious conduct and as will serve as an example to prevent a repetition of such conduct in the future;
3. Reasonable attorney's fees pursuant to 42 US 1988, along with costs incurred in this action; and
4. Such other and further relief as the court deems just and appropriate.



Eugene N. Traunfeld  
Attorney for Plaintiff  
P.O. Box 59319  
Chicago, IL 60659  
312.213.8095